

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

RYAN, LLC,

Plaintiff,

CHAMBER OF COMMERCE OF THE  
UNITED STATES OF AMERICA, *et al.*,

Plaintiff-Intervenors,

v.

FEDERAL TRADE COMMISSION,

Defendant.

No. 3:24-cv-986-E

**PLAINTIFF AND PLAINTIFF-INTERVENORS’  
NOTICE OF SUPPLEMENTAL AUTHORITIES**

Yesterday, Friday June 28, the Federal Trade Commission posted the Statements of Commissioners Ferguson and Holyoak dissenting from the Commission’s adoption of the Rule at issue in this case. Plaintiff and Plaintiff-Intervenors respectfully submit the Statements, which are Exhibits A and B hereto, for the Court’s consideration in connection with the pending motions for a stay and preliminary injunction.

Dated: June 29, 2024

Respectfully submitted,

/s/ Robert L. Sayles

Robert L. Sayles  
Texas Bar No. 24049857  
Boyce Holleman  
Texas Bar No. 24126727  
BRADLEY ARANT BOULT  
CUMMINGS LLP  
1445 Ross Avenue  
Suite 3600  
Dallas, TX 75202  
Tel: 214.257.9800  
rsayles@bradley.com  
bholleman@bradley.com

Jeffrey B. Wall (*pro hac vice*)  
Judson O. Littleton (*pro hac vice*)  
SULLIVAN & CROMWELL LLP  
1700 New York Avenue, N.W.  
Washington, D.C. 20006  
Tel: .202.956.7000  
wallj@sullcrom.com  
littletonj@sullcrom.com

*Counsel for Plaintiff-Intervenors*

/s/ Allyson N. Ho

Allyson N. Ho  
Texas Bar No. 24033667  
Elizabeth A. Kiernan  
Texas Bar No. 24105666  
GIBSON, DUNN & CRUTCHER LLP  
2001 Ross Avenue, Suite 2100  
Dallas, TX 75201  
Tel: 214.698.3100  
aho@gibsondunn.com  
ekiernan@gibsondunn.com

Eugene Scalia (*pro hac vice*)  
Amir C. Tayrani (*pro hac vice*)  
Andrew G. I. Kilberg (*pro hac vice*)  
Aaron Hauptman (*pro hac vice*)  
Joshua R. Zuckerman (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036  
Tel: 202.955.8500  
escalia@gibsondunn.com  
atayrani@gibsondunn.com  
akilberg@gibsondunn.com  
ahauptman@gibsondunn.com  
jzuckerman@gibsondunn.com

*Counsel for Plaintiff*

*Additional Counsel Listed on Next Page*

Jordan L. Von Bokern (*pro hac vice*)  
Tyler S. Badgley (*pro hac vice*)  
U.S. CHAMBER LITIGATION  
CENTER  
1615 H Street N.W.  
Washington, DC 20062  
Tel: 202.463.5337  
jvonbokern@uschamber.com  
tbadgley@uschamber.com

*Counsel for Plaintiff-Intervenor  
Chamber of Commerce of United  
States of America*

Liz Dougherty (*pro hac vice pending*)  
BUSINESS ROUNDTABLE  
1000 Maine Avenue S.W.  
Washington, DC 20024  
Tel: 202.872.1260  
ldougherty@brt.org

*Counsel for Plaintiff-Intervenor  
Business Roundtable*

Charles W. Fillmore  
Texas Bar No. 00785861  
H. Dustin Fillmore III  
Texas Bar No. 06996010  
THE FILLMORE LAW FIRM LLP  
201 Main Street, Suite 700  
Fort Worth, TX 76102  
Tel: 817.332.2351  
chad@fillmorefirm.com  
dusty@fillmorefirm.com

*Counsel for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 29, 2024, I electronically transmitted the attached document to the Clerk of the Court and all counsel of record using the ECF System for filing and service in accordance with this Court's ECF Order.

/s/Robert L. Sayles  
Robert L. Sayles